

Exhibit C

From: [John D. Coyle](#)
To: [Chantal Khalil](#)
Cc: [Greg Blankinship](#); [William Mosca](#); sporcellio@bsk.com; [Anna Sullivan](#)
Subject: Re: Gonzales v. Agway preliminary document production (Contains Information Marked Highly Confidential-Attorney's Eyes Only pursuant to 7/6/18 Confidentiality Order)
Date: Wednesday, July 11, 2018 9:17:14 AM

Chantal: I've offered to help walk you through those many times and will continue to do so. No, these are not a complete set of anything. I thought the fact that we have been discussing a preliminary production to give you an overview of information that will be fully produced. We are finalizing the written responses now.

As for the 30(b)(6) deposition, I refer to my detailed letter explaining how you have sought an incredible volume of information from the witness and the amount of time it will take to gather the information to prepare the witness. We have been working towards that goal and are continuing to do so. Greg and I traded messages yesterday to discuss this. I am in court this morning but will be back in around noon if you would like to schedule something to discuss further.

John

Sent from my iPhone

On Jul 11, 2018, at 9:01 AM, Chantal Khalil <ckhalil@fbfglaw.com> wrote:

John,

Thank you for sending these documents and for the accompanying letter. As I'm sure you are aware, a few documents remain outstanding, namely, customer database data concerning Ms. Gonzales, and all correspondence and communications with Ms. Gonzales. We would also appreciate if you could explain Exhibits 7 and 8 because they are difficult to comprehend as currently produced and I'm not sure that Exhibit 8 is a pricing model (as it doesn't appear to contain sufficient information to set the variable rate). Please produce the remaining documents and confirm that Exhibit 8 is in fact the complete pricing model that Agway uses to generate the variable rate each month by the end of the day. We have been very generous in extending time to produce the agreed-upon documents but, as you know, the 30(b)(6) deposition is on July 16 and you are putting us in an unfair position.

Best,
Chantal

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On Jul 9, 2018, at 6:24 PM, John D. Coyle <jcoyle@bmg.law> wrote:

Ms. Khalil:

Pursuant to our email discussions, enclosed please find a letter dated July 9, 2018 with exhibits. This is the preliminary document production we discussed. The purpose of this preliminary production is to provide Plaintiffs with an initial overview of the materials you requested. The pricing information spreadsheets are large and it will be very difficult to produce same in a native format by email. When you and Mr. Blankinship are willing to discuss EDI, we can work to provide these files in a more usable native format. I am available to walk you through the documents and to discuss the information whenever you have reviewed same.

Thank you
John Coyle

<00074578.pdf><Agway - Exhibit 7.pdf><Agway - Exhibit 1.pdf><Agway - Exhibit 2.pdf><Agway - Exhibit 4.pdf><Exhibit 8 (00074830xB6AAE).pdf><Agway - Exhibit 3.pdf><Agway - Exhibit 5.pdf><Agway - Exhibit 6.pdf>